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Designated solely for service pursuant to LR IA 11-1(b)

Attorneys for Plaintiff Thomas Brown

UNITED STATES DISTRICT COURT
IN AND FOR THE DISTRICT OF NEVADA

THOMAS BROWN, an individual,

Plaintiff,

vs.

AUTOMOBILI LAMBORGHINI
AMERICA, LLC, a Delaware limited liability
company; FINDLAY DIGUILIO, LLC, d/b/a
LAMBORGHINI LAS VEGAS, a/k/a A
Findlay Automotive Property,

Defendants.

Case No. 2:23-CV-1415-CDS-BNW

**STIPULATED MOTION AND
[PROPOSED] ORDER TO STAY
DISCOVERY PLAN AND SCHEDULING
ORDER DEADLINE**

IT IS HEREBY STIPULATED AND AGREED, by Plaintiff Thomas Brown
("Plaintiff"), and Defendants Automobili Lamborghini America, LLC ("ALA") and Findlay
Digulio, LLC dba Lamborghini Las Vegas aka A Findlay Automotive Property ("LVV")
(collectively, "Defendants"), through their respective counsel, that the deadline to submit the

Discovery Plan and Scheduling Order (“DPSO”) in this action be stayed so that the parties can engage in alternative dispute resolution prior to submitting the DPSO.

If the parties are not successful in resolving their disputes, they will thereafter submit the DPSO. Thus, there is good cause for a stay the submission of the DPSO until after the parties engage in alternative dispute resolution.

DATED this 6th day of December 2023.

RAY QUINNEY & NEBEKER P.C.

SNELL & WILMER L.L.P.

/s/ Z. Ryan Pahnke

/s/ Dawn L. Davis

Z. Ryan Pahnke

Dawn L. Davis

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Attorneys for Plaintiff Thomas Brown

and

and

Christian P. Ogata

Nevada Bar No. 15612

David J. Malley

Attorneys for Defendants

Nevada Bar No. 8171

Designated counsel pursuant to LR IA 11-1(b)

ORDER

IT IS SO ORDERED.


UNITED STATE MAGISTRATE JUDGE

Dated 12/7/2023

CERTIFICATE OF SERVICE

I hereby certify that on the 6th day of December 2023, I electronically filed the foregoing **STIPULATED MOTION AND [PROPOSED] ORDER TO STAY DISCOVERY PLAN AND SCHEDULING ORDER DEADLINE** with the Court's CM/ECF Program, which provided notice to counsel of record in this matter.

RAY QUINNEY & NEBEKER P.C.

By: Z. Ryan Pahnke

Attorneys for Plaintiff Thomas Brown